

EXHIBIT B

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

A.M., an individual,)	Case No. 3:21-cv-01674-MO
)	
Plaintiff,)	PLAINTIFF'S FIRST
)	INTERROGATORIES TO DEFENDANT
v.)	OMEGLE
)	
OMEGLE.COM LLC,)	
)	
Defendant.)	
_____)	

TO: Defendant Omegle.com LLC and its attorneys of record.

Pursuant to Federal Rules of Civil Procedure 33 and 34, Plaintiff requests that Defendant Omegle.com LLC answer the following Interrogatories in writing and under oath, within 30 days of service.

DEFINITIONS AND INSTRUCTIONS

1. Pursuant to Rule 26(e)(2), your responses to these discovery requests should be supplemented if you obtain further information or documents before the time of trial.
2. As used in this request, the term the “Defendant,” “you,” and “your” refer to Omegle.com LLC.
3. “Communication” or “communications” mean any writing transmitted between persons and/or any record of oral conversations of any kind, including but not limited to personal conversations, telephone conversations, letters, meetings, memoranda, faxes, emails, voicemails, text messages, social networking messages and posts (such as, for example, Facebook, Twitter, Instagram, LinkedIn, Google+, and YouTube), and any other electronic communications or transmittals of communications of any type.
4. “Identify” means the full name and, if known, the address, telephone number, and email of the person or entity described.
5. When referring to documents and things, “identify” means to supply the type of document, subject matter, date of creation, date of creation of subsequent versions, author(s), addressee(s), and recipient(s).
6. “Relating to” includes but is not limited to the following phrases: regarding, about, relating to, referring to, referencing, naming, describing, and mentioning.
7. “Policies” include but are not limited to policies, procedures, rules, guidelines, and

responsibilities, in whatever form, whether written or oral.

8. “Sexual abuse,” “child sexual abuse,” or “child abuse” are intended to cover any form of inappropriate sexual conduct between an adult and a minor child (under age 18). Such conduct includes, but is not limited to “child abuse” as it is defined in ORS 419B.005.

INTERROGATORIES

INTERROGATORY NO. 1: Identify each person likely to have discoverable information that Defendant may use to support its defense and affirmative defenses against the claims in this case, along with the subjects of that information, unless the use would be solely for impeachment, in the manner required by FRCP 26(a)(1)(A)(i).

RESPONSE:

INTERROGATORY NO. 2: Identify all documents, electronically stored information, and tangible things that Defendant has in its possession, custody, or control that Defendant may use to support its defense and affirmative defenses against the claims in this case, unless the use would be solely for impeachment, in the manner required by FRCP 26(a)(1)(A)(ii).

RESPONSE:

INTERROGATORY NO. 3: Identify all current or former employee(s), including their current or last known address and phone number, who worked by Omegle during the 2014 to 2018 time period.

RESPONSE:

INTERROGATORY NO. 4: Identify the case name and number of any matter where an employee of Omegle has provided deposition or trial testimony as a witness or party.

RESPONSE:

INTERROGATORY NO. 5: Identify which Omegle employees or other individuals designed the Omegle application and/or website.

RESPONSE:

INTERROGATORY NO. 6: Identify all complaints and allegations Defendant is aware of involving instances of users being harmed by other users.

RESPONSE:

INTERROGATORY NO. 7: Identify each and every person whom you expect to call as an expert witness in the trial of this case and state specifically the subject upon which each expert is expected to testify.

RESPONSE:

INTERROGATORY NO. 8: Describe in detail when and how Omegle first became aware of child sexual exploitation taking place on its platform.

RESPONSE:

INTERROGATORY NO. 9: Describe in detail Omegle's method for determining the identity of a user (and banning said user) who has engaged in abuse on Omegle.

RESPONSE:

INTERROGATORY NO. 10: Describe in detail Omegle's method(s), if any, of preventing children from being matched with adults; indicate when that method went into effect and the duration of it.

RESPONSE:

INTERROGATORY NO. 11: Describe in detail Omegle's policies systems and procedures for becoming aware of and responding to instances of child exploitation on its platform.

RESPONSE:

INTERROGATORY NO. 12: Identify by case number and date, each law enforcement investigations into child abuse that originated via Omegle between 2009 and 2014.

RESPONSE:

INTERROGATORY NO. 13: Identify how many IP addresses were flagged for potentially including images of child pornography between the 2009 and 2014 time period.

RESPONSE:

INTERROGATORY NO. 14: Identify all transcripts in existence for sworn testimony given by Omegle employees pertaining to child pornography that is alleged to have been transmitted on Omegle.

RESPONSE:

INTERROGATORY NO. 15: Describe in detail Omegle's method of earning revenue.

RESPONSE:

INTERROGATORY NO. 16: Provide the name and last known address, email address, and telephone number of each individual who located or assisted locating documents responsive to Plaintiff's Request for Production.

RESPONSE:

Dated: July 18, 2022

/s/ Barbara Long

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Attorneys for Plaintiff A. M.

CERTIFICATE OF SERVICE

I certify that I served the foregoing **PLAINTIFF'S FIRST INTERROGATORIES TO DEFENDANT OMEGLE.COM** on the below by the following indicated method or methods:

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DATED THIS 18th day of July 2022.

VOGT & LONG PC

/s/ Laura McIntyre

Laura McIntyre

Legal Assistant to Vogt & Long PC